

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20054

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of

Progeny LMS, LLC

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RM No. 10403

Amendment of ~~Part~~ 90 of the
Commissions Rules Governing
The Location and Monitoring
Service to Provide Greater Flexibility

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REPLY COMMENTS ON ARRAYCOMM, INC.

ArrayComm, Inc. (hereinafter ArrayComm) is pleased to submit the following Reply Comments
in the above-entitled matter.

June 4, 2002

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ArrayComm is a leader in the development of next generation wireless technology. It has been particularly active in the development of “smart antennas” and for its utilization of Time Division Duplex (TDD) technology to provide high-speed wireless data systems.

Over the past three years, ArrayComm has participated in several Commission rule-making proceedings that have involved the allocation or reallocation of spectrum for wireless purposes. More recently, ArrayComm has been vitally interested in the 1670-1675 MHz band which is a part of GN Docket No. 02-08. That proceeding is moving rapidly toward completion; a Report and Order ‘containing the service rules has been adopted, and a Public Notice’ setting forth the date for Auction along with the appropriate ground rules has been issued. The 1670-1675 MHz band continues to be the focus of ArrayComm’s spectrum-related objectives.

As ArrayComm has stated in other dockets, mobile wireless data will become an increasingly important service, and one that is best – most economically and efficiently—delivered by TDD systems. It is important, therefore, that spectrum be available to accommodate such services.

The instant petition filed by Progeny LMS, LLC (“Progeny”) coupled with the encouraging step by the Commission in putting it out for public comment is, therefore, encouraging. In fact, ArrayComm has been specifically asked by Progeny whether it would participate in this stage of the Docket and, in particular, to evaluate the use of this band for TDD purposes.

In the abstract, the 900 MHz band is well-suited for mobile use, including TDD. The part of the band that has been, and could be, subject to licensing, via auctions, is attractive in size.

¹ **Adopted** May 10, 2002.
Public Notice **DA** 02-1257, released May 24, 2002

CERTIFICATE OF SERVICE

I, Danielle Marie Gibbs, certify that on this 4th day of June, 2002, a true and correct copy of the foregoing Comments of ArrayComm, Inc. were served via courier or First Class Mail* on the following persons:


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